December 5, 2012

Dear Imaging Equipment Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) is pleased to share with you the attached Final Draft ENERGY STAR Version 2.0 Imaging Equipment specification. EPA would like to thank the many stakeholders who have invested time and effort over the past many months to contribute feedback that has informed this specification development process.

This document outlines the proposed new energy efficiency requirements that Imaging Equipment would need to meet in order to earn the ENERGY STAR. It is intended that once final, this document will replace the current Version 1.2 specification. The anticipated effective date for the Version 2.0 requirements is October 1, 2013.

The proposed Final Draft requirements reflect comments received on the previous Draft 2 version, discussions held during the ENERGY STAR stakeholder meeting, and individual stakeholder discussions.

The following key changes are proposed in this Final Draft version:

- **Definitions** – Minor edits have been made to definitions for digital front end based on stakeholder feedback.

- **Digital Front End performance levels** – EPA has received additional feedback from stakeholders and is proposing a lower power supply efficiency assumption for Operational Mode products sold with Type 2 DFEs. When an Imaging Equipment product is in Sleep Mode, the internal power supply is operating at a significantly lower load point, resulting in power supply efficiency of approximately 60%. EPA proposes to divide the measured TEC_{DFE} value in Section 3.4.2 by 0.60, reflecting this assumption of 60% power supply efficiency with the Imaging Equipment in Sleep Mode.

- **Automatic Duplexing Requirements** – Based on stakeholder discussions and data, EPA has revised the requirements to reflect the current segmentation based on color and speed capabilities but has amended the speed bins to reflect improvements in products currently available in the market. EPA has added the exclusion for single sided printing for special single sided media. EPA is also proposing to retain the current allowance for the labeled unit to be shipped without a duplex tray, with noted requirements.

- **Impact of A3 versus A4 paper width** – Based on stakeholder feedback, EPA conducted an analysis on the impact of A3 versus A4 paper width on printer qualification rates. EPA did find a lower qualification rate among products using A3 paper. As such, EPA is proposing an adder of 0.20 kWh/week for A3 paper width products to ensure adequate selection.

- **Reporting Recovery time** – Based on stakeholder discussions, EPA reviewed the current qualified data set to see what values were being reported and what values would provide useful information for consumers on our qualified product lists. EPA is proposing to list the simple average of Active 0,
Active 1, and Active 2. EPA believes that this would provide useful information to consumers while discouraging the favoring of one mode over another.

- **Functional Adders** – Based on stakeholder input and discussions, EPA has added mailing machines to the list of acceptable product classes eligible to apply the power supply adder.

- **Effective Date** – An effective date of October 1, 2013, is now proposed to provide manufacturers appropriate time to transition collateral material to the new requirements. EPA anticipates finalizing this Version 2.0 specification by January, 2013.

These proposed changes, and additional minor updates, are identified and discussed in greater detail within text boxes presented throughout the attached Final Draft specification.

In establishing the revised proposed performance levels, EPA re-analyzed data associated with over 2200 Imaging Equipment models currently available in the market. A masked version of the dataset is posted to the ENERGY STAR website at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs).

**Submittal of Written Comments**
Comments on the Final Draft Version 2.0 specification should be submitted via email by December 28, 2012, to imagingequipment@energystar.gov. All comments received will be posted to the ENERGY STAR Product Development Web site, unless the submitter specifically requests that his or her comments remain confidential.

**Imaging Equipment Webinar to Discuss Final Draft**
On December 18, 2012, from 11 AM to 1PM, Eastern Time, EPA will host a stakeholder webinar to present details on the revisions made in the Final Draft Version 2.0 ENERGY STAR Imaging Equipment specification and the data analysis performed to date, as well as address stakeholder questions regarding the proposed changes. If you wish to attend this meeting, please RSVP to imagingequipment@energystar.gov no later than December 17, 2012.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. To track EPA’s progress in revising the ENERGY STAR Imaging Equipment specification and to review comments, please visit the Product Development Web site at [www.energystar.gov/RevisedSpecs](http://www.energystar.gov/RevisedSpecs) and click on “Imaging Equipment.”

**Third-Party Certification**
Manufacturers are reminded that as of January 1, 2011, all new products must be certified by an EPA-recognized Certification Body (CB) before being labeled and marketed as ENERGY STAR. Upon satisfactory completion of all certification requirements, a CB will notify the ENERGY STAR Partner that the product is ENERGY STAR qualified and will submit qualified product data to EPA for listing on the ENERGY STAR website. For more information on the Third-party Certification program please visit [www.energystar.gov/3rdpartycert](http://www.energystar.gov/3rdpartycert).

Thank you for your continued support of ENERGY STAR. Please contact me at (202) 343-9046 or kent.christopher@epa.gov or Matt Malinowski at (202) 862-2693 or matt.malinowski@icfi.com with any questions or comments regarding this specification revision. For questions relating to the test method, please contact Bryan Berringer at (202) 586-0371 or Bryan.Berringer@ee.doe.gov.

Sincerely,

Christopher Kent,
Product Manager Imaging Equipment
ENERGY STAR Program